

National Telecommuting Institute, Inc.

Specializing in Homebased Training and Job Placement for Individuals with Disabilities

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

In the Matter of)
Universal Service)

Docket No. 96-45

Comments of the Presidents Committee on Employment of People With Disabilities and the
National Telecommuting Institute

To the Commission:

The Presidents Committee on Employment of People With Disabilities and the National
Telecommuting Institute are writing in response to your request for comments in the NPRM,
FCC 96-45, in the above captioned proceeding.

The President's Committee on Employment of People with Disabilities is an independent federal
agency based in Washington, D.C. The Committee's mission is to facilitate the communication,
coordination and promotion of public and private efforts to enhance the employment of people
with disabilities. National Telecommuting Institute, (NTI), is a non-profit organization based in
Boston. NTI's mission is to assist individuals with disabilities who need homebased work. NTI
works with state vocational rehabilitation agencies across the country to train and place
homebound individuals into telecommuting positions.

COMMENTS

The Problem:

Homebound individuals with disabilities can, in many cases, work full-time jobs if they
are allowed to telecommute. The percentage of employers offering full-time telecommuting
positions is thus far very small. To connect to one of these employers on a regular basis using
voice or data lines, a homebound individual may have to use a long distance service. These long
distance charges are often enough of an obstacle that the employer/employee connection is not
made.

a non-profit corporation

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A Proposed Solution:

If the FCC were to rule that costs incurred for connecting a homebound disabled individual to an employer via voice or data lines were covered under the Universal Service Fund, then employers, individuals with disabilities, and society as a whole would reap certain benefits. Such a ruling would reduce or remove the need for the government to provide public assistance benefits to those homebound individuals affected, as they would be able to earn a living. Connecting homebound individuals to the workforce would also increase productivity, growth and competition within our economy.

Background Information:

In 1995, a total of 1,250,314 individuals with disabilities nationwide were active state vocational rehabilitation agency consumers. While this number certainly does not include all individuals with disabilities who are unemployed and interested in finding work, it does cover those who have been approved for services by the federal/state vocational rehabilitation system and therefore, certain information about this population has been collected. For example, in a 1994 survey of Massachusetts vocational rehabilitation counselors, these counselors estimated that 12% of the consumers in their caseloads could perform and would accept jobs if they were allowed to work from home, but would not be able to perform the same type of work if they were required to report to an on-site location on a daily basis. The nature of these individuals' disabilities coupled with their transportation options, simply made it too difficult for them to hold a conventional on-site position. If this 12% figure is extrapolated to state vocational rehabilitation consumers nationwide, then there are an estimated 150,000 homebound individuals who can and would work if given the opportunity to telecommute.

State vocational rehabilitation agencies are usually willing to incur the one-time expense of providing homebound individuals with computers and software which will enable them to telecommute. There is no mechanism available, however, to cover ongoing expenses such as long distance telephone charges that may be necessary for a telecommuting employment connection to take place. An FCC ruling would remedy that problem.

This is not to imply that an FCC ruling would result in the immediate employment of tens of thousands of homebound individuals. The jobs must be available for that to take place, and the telecommuting movement is, at this point in time, still in its infancy. All indications are, however, that the number and variety of full-time telecommuting positions will grow. An FCC ruling is a signal to the private sector that there are no additional costs involved in seeking out homebound individuals to fill their telecommuting positions. As a few employers have already discovered, individuals with disabilities such that they are already spending much of their time at home, constitute an ideal workforce for companies looking for homebased workers. These jobs are valued. Turnover is lower, and the underutilized nature of the homebound disabled population mean that it is often easier to find more motivated, better qualified applicants within this group than can be found within the general population.

A Proposal To The FCC:

Low-income Americans are among those for whom the FCC has pledged assurance that they will receive reasonably priced telephone service. Homebound individuals with disabilities can easily fit within this low-income category. According to the Rehabilitation Services Administration's Office of Program Operation, the earned income of severely disabled individuals at the time they apply for assistance from their state vocational rehabilitation agency is \$36.13 per week. These individuals are surviving primarily on some form of public assistance and from private support, i.e., family and friends.

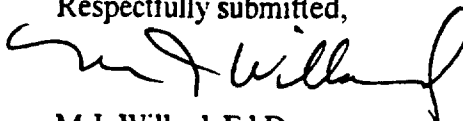
We propose that the FCC rule that in the event that a given individual is certified by their state vocational rehabilitation agency as both 1) low income; and 2) in need of homebased employment, then an employer who hires such an individual would be able to apply to their long distance provider for a waiver for all voice and data line charges incurred in order to connect the homebound worker to the company. The service providers in turn, would be able to request reimbursement from the Universal Service Fund for these same costs. These charges would include:

- long distance charges between employer and home-worker;
- local access charges; and
- the monthly maintenance expense of one, or even two, business lines into the home if such lines are required for the telecommuting connections to take place.

Should training via the telephone be necessary to prepare a homebound individual for a telecommuting position, then it is further proposed that the cost of connecting the homebound trainee to the trainer via the telephone lines also be covered by the Universal Service Fund. Only training institutions authorized by the state vocational rehabilitation agencies to provide instruction to homebound individuals would qualify. These institutions would apply to their long distance service provider for a waiver of connection charges between the instructor and the certified trainee. The long distance provider would, in turn, submit their request for reimbursement to the Universal Service Fund.

The proposal put forth in this filing is by no means the only mechanism which would address the difficulties experienced by homebound telecommuters. We would be very open to, and supportive of, any proposal which would solve the problem.

Respectfully submitted,



M.J. Willard, Ed.D.
Executive Director

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